

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Obj. Deadline: November 19, 2024 at 4:00 p.m. ET

**EIGHTEENTH MONTHLY FEE STATEMENT OF ERNST & YOUNG LLP AS
TAX SERVICES PROVIDER TO THE DEBTORS AND DEBTORS-IN-POSSESSION
FOR COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD
FROM MAY 1, 2024 THROUGH AND INCLUDING MAY 31, 2024**

Name of Applicant	Ernst & Young LLP
Authorized to Provide Professional Services to:	the Debtors and Debtors-in-Possession
Date of Retention:	January 17, 2023 <i>nunc pro tunc</i> to November 28, 2022
Period for which compensation and reimbursement is sought:	May 1, 2024 through May 31, 2024
Amount of Compensation sought as actual, reasonable and necessary:	\$1,542,852.80
80% of Compensation sought as actual, reasonable and necessary:	\$1,234,282.24
Amount of Expense Reimbursement sought as actual, reasonable, and necessary:	\$88,956.07

This is a(n) **X** monthly ____ interim ____ final application. No prior application has been filed with respect to this Fee Period.

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

PRIOR MONTHLY FEE STATEMENTS FILED

Dated Filed	Period Covered	Requested Fees	Requested Expenses	Approved Fee	Approved Expenses
D.I. 847 filed on March 10, 2023	November 28, 2023 through December 31, 2023	\$1,264,113.80	\$12,330.63	\$2,086,386.45	\$43,916.74
D.I. 1500 filed on May 16, 2023	January 1, 2023 through January 31, 2023	\$1,130,705.00	\$32,893.58		
D.I. 1627 filed on June 13, 2023	February 1, 2023 through February 28, 2023	\$1,215,238.75	\$10,381.09	Pending	Pending
D.I. 1932 filed on July 27, 2023	March 1, 2023 through March 31, 2023	\$1,596,707.00	\$26,108.75	Pending	Pending
D.I. 2985 filed on October 3, 2023	April 1, 2023 through April 30, 2023	\$1,372,281.75	\$7,276.19	Pending	Pending
D.I. 3377 filed on October 25, 2023	May 1, 2023 through May 31, 2023	\$1,327,255.00	\$17,767.20	Pending	Pending
D.I. 5317 filed on January 3, 2024	June 1, 2023 through June 30, 2023	\$1,428,255.75	\$4,846.35	Pending	Pending
D.I. 12924 filed on April 26, 2024	July 1, 2023 through July 31, 2023	\$1,437,560.80	\$11,469.23	Pending	Pending
D.I. 12925 filed on April 26, 2024	August 1, 2023 through August 31, 2023	\$1,899,489.25	\$21,319.67	Pending	Pending
D.I. 12926 filed on April 26, 2024	September 1, 2023 through September 30, 2023	\$1,356,469.80	\$9,754.18	Pending	Pending

Dated Filed	Period Covered	Requested Fees	Requested Expenses	Approved Fee	Approved Expenses
D.I. 15991 filed on May 28, 2024	October 1, 2023 through October 31, 2023	\$1,518,739.15	\$22,627.72	Pending	Pending
D.I. 15992 filed on May 28, 2024	November 1, 2023 through November 30, 2023	\$1,246,282.20	\$54,286.25	Pending	Pending
D.I. 15993 filed on May 28, 2024	December 1, 2023 through December 31, 2023	\$1,125,361.50	\$40,092.30	Pending	Pending
D.I. 16530 filed on June 3, 2024	January 1, 2024 through January 31, 2024	\$1,479,449.30	\$141,396.07	Pending	Pending
D.I. 16545 filed on June 3, 2024	February 1, 2024 through February 29, 2024	\$1,444,701.70	\$96,102.20	Pending	Pending
D.I. 16548 filed on June 3, 2024	March 1, 2024 through March 31, 2024	\$966,665.10	\$34,889.16	Pending	Pending
D.I. 24500 filed on September 10, 2024	April 1, 2024 through April 30, 2024	\$1,326,416.00	\$69,783.85	Pending	Pending

SUMMARY OF BILLING BY PROFESSIONAL
MAY 1, 2024 THROUGH AND INCLUDING MAY 31, 2024

Name	Type	Rank	Hours	Hourly Rate	Total Individual Fees
Lowery,Kristie L	Billable	National Partner/Principal	36.10	1,040.00	\$ 37,544.00
Lowery,Kristie L	Travel ¹	National Partner/Principal	10.60	520.00	5,512.00
McComber,Donna	Billable	National Partner/Principal	9.50	1,040.00	9,880.00
Bailey,Doug	Billable	Partner/Principal	112.40	866.00	97,338.40
Bastienne,Oliver	Billable	Partner/Principal	5.80	866.00	5,022.80
Buduguntae,Shashanka R	Billable	Partner/Principal	5.70	866.00	4,936.20
Cho,Shuck	Billable	Partner/Principal	0.50	866.00	433.00
Delff,Björn	Billable	Partner/Principal	0.20	866.00	173.20
Ferris,Tara	Billable	Partner/Principal	7.90	866.00	6,841.40
Leston,Juan	Billable	Partner/Principal	11.00	866.00	9,526.00
Liasis,George	Billable	Partner/Principal	0.50	866.00	433.00
Lovelace,Lauren	Billable	Partner/Principal	25.10	866.00	21,736.60
Nakagami,Jun	Billable	Partner/Principal	0.60	866.00	519.60
Rumford,Neil	Billable	Partner/Principal	0.70	866.00	606.20
Shea JR,Thomas M	Billable	Partner/Principal	53.60	866.00	46,417.60
Socratous,Christoforos	Billable	Partner/Principal	1.50	866.00	1,299.00
Suto,Ichiro	Billable	Partner/Principal	1.00	866.00	866.00
Walker,Rachael Leigh Braswell	Billable	Partner/Principal	4.10	866.00	3,550.60
Nasir,Tariq	Billable	Partner/Principal	0.40	866.00	346.40
Wielobob,Kirsten	Billable	Partner/Principal	2.50	866.00	2,165.00
Haraguchi,Taichi	Billable	Partner/Principal	0.60	866.00	519.60
Srinivasan,Showri	Billable	Partner/Principal	1.50	866.00	1,299.00
Borts,Michael	Billable	Managing Director	3.00	814.00	2,442.00
Bost,Anne	Billable	Managing Director	43.80	814.00	35,653.20
DeVincenzo,Jennie	Billable	Managing Director	8.90	814.00	7,244.60
Dubroff,Andy	Billable	Managing Director	9.40	814.00	7,651.60
Dudrear,David	Billable	Managing Director	2.20	814.00	1,790.80
Koch,Markus	Billable	Managing Director	7.20	814.00	5,860.80
Acharya,Prashant	Billable	Managing Director	0.60	814.00	488.40
Poloner,Seth	Billable	Managing Director	23.10	814.00	18,803.40
Watkins,Michael	Billable	Managing Director	6.40	814.00	5,209.60
Harrindranauth,Yud	Billable	Managing Director	0.50	814.00	407.00
Berman,Jake	Billable	Senior Manager	38.00	683.00	25,954.00
Devona Bahadur,Michele	Billable	Senior Manager	2.90	683.00	1,980.70
Espley-Ault,Olivia	Billable	Senior Manager	13.00	683.00	8,879.00
Faerber,Anna	Billable	Senior Manager	6.80	683.00	4,644.40
Gatt,Katie	Billable	Senior Manager	1.70	683.00	1,161.10
Gil Diez de Leon,Marta	Billable	Senior Manager	4.30	683.00	2,936.90
Goto,Keisuke	Billable	Senior Manager	9.80	683.00	6,693.40
Hernandez,Nancy I.	Billable	Senior Manager	3.40	683.00	2,322.20
Jayanthi,Lakshmi	Billable	Senior Manager	24.20	683.00	16,528.60
Katsnelson,David	Billable	Senior Manager	8.80	683.00	6,010.40

Name	Type	Rank	Hours	Hourly Rate	Total Individual Fees
Matsuo,Eiko	Billable	Senior Manager	2.00	683.00	1,366.00
Musano,Matthew Albert	Billable	Senior Manager	14.80	683.00	10,108.40
Papachristodoulou,Elpida	Billable	Senior Manager	1.70	683.00	1,161.10
Schwarzwlder,Christian	Billable	Senior Manager	19.10	683.00	13,045.30
Taniguchi,Keisuke	Billable	Senior Manager	28.60	683.00	19,533.80
Tong,Chia-Hui	Billable	Senior Manager	32.10	683.00	21,924.30
Wrenn,Kaitlin Doyle	Billable	Senior Manager	39.00	683.00	26,637.00
Wrenn,Kaitlin Doyle	Travel ¹	Senior Manager	10.60	341.50	3,619.90
Yang,Rachel Sim	Billable	Senior Manager	16.50	683.00	11,269.50
Porto,Michael	Billable	Senior Manager	45.50	683.00	31,076.50
Schug,Elaine	Billable	Senior Manager	1.50	683.00	1,024.50
Andriani,Margherita	Billable	Senior Manager	2.30	683.00	1,570.90
Babikian,Mher	Billable	Senior Manager	1.80	683.00	1,229.40
Engelbrecht,Kevin	Billable	Senior Manager	5.80	683.00	3,961.40
Kyriakides,Stavros	Billable	Senior Manager	3.30	683.00	2,253.90
Lunia,Suraj	Billable	Senior Manager	1.80	683.00	1,229.40
Madrası,Hussain	Billable	Senior Manager	6.80	683.00	4,644.40
McGee,Liz	Billable	Senior Manager	27.20	683.00	18,577.60
Suzuki,Jason	Billable	Senior Manager	62.90	683.00	42,960.70
Capasso,Nick	Billable	Senior Manager	1.00	683.00	683.00
Hines,Chip	Billable	Senior Manager	1.00	683.00	683.00
Messing,Daniel	Billable	Senior Manager	2.10	683.00	1,434.30
Pavlou,Pantelis	Billable	Senior Manager	0.40	683.00	273.20
Pfaff,Arthur	Billable	Senior Manager	1.90	683.00	1,297.70
Wainwright,Luke	Billable	Senior Manager	2.30	683.00	1,570.90
Billings,Phoebe	Billable	Manager	12.90	551.00	7,107.90
Bouza,Victor	Billable	Manager	15.90	551.00	8,760.90
Carreras,Stephen	Billable	Manager	1.00	551.00	551.00
Chang-Waye,Amanda	Billable	Manager	7.80	551.00	4,297.80
Dugasse,Annie	Billable	Manager	5.80	551.00	3,195.80
Dulceak,Crystal	Billable	Manager	1.50	551.00	826.50
Gorman,Doug	Billable	Manager	113.00	551.00	62,263.00
Hammon,David Lane	Billable	Manager	109.90	551.00	60,554.90
Hammon,David Lane	Travel ¹	Manager	4.40	275.50	1,212.20
Katelas,Andreas	Billable	Manager	8.20	551.00	4,518.20
McPhee,Tiffany	Billable	Manager	5.30	551.00	2,920.30
Mistler,Brian M	Billable	Manager	81.20	551.00	44,741.20
Richardson,Audrey Sarah	Billable	Manager	15.80	551.00	8,705.80
Short,Victoria	Billable	Manager	13.40	551.00	7,383.40
Srivastava,Nikita Asutosh	Billable	Manager	0.30	551.00	165.30
Tsikkouris,Anastasios	Billable	Manager	0.70	551.00	385.70
Varma,Bharath	Billable	Manager	1.50	551.00	826.50
Zheng,Eva	Billable	Manager	7.00	551.00	3,857.00
Mehta,Saurabh	Billable	Manager	0.30	551.00	165.30
Ossanlou,Nina Shehrezade	Billable	Manager	51.80	551.00	28,541.80
Wagner,Kaspar	Billable	Manager	27.80	551.00	15,317.80
Jung,Yu-Seon	Billable	Manager	1.00	551.00	551.00

Name	Type	Rank	Hours	Hourly Rate	Total Individual Fees
Oyetunde,Oyebode	Billable	Manager	26.40	551.00	14,546.40
Cushner,Sam	Billable	Manager	24.80	551.00	13,664.80
Mizutani,Rie	Billable	Manager	82.00	551.00	45,182.00
Ancona,Christopher	Billable	Senior	103.40	415.00	42,911.00
Asim,Malik Umer	Billable	Senior	9.00	415.00	3,735.00
Bote,Justin	Billable	Senior	8.70	415.00	3,610.50
Chachan,Aparajita	Billable	Senior	9.70	415.00	4,025.50
Di Stefano,Giulia	Billable	Senior	70.40	415.00	29,216.00
Figuroa,Carolina S	Billable	Senior	32.10	415.00	13,321.50
Gibson,Mitch	Billable	Senior	0.80	415.00	332.00
Hall,Emily Melissa	Billable	Senior	31.90	415.00	13,238.50
Hayashi,Rina	Billable	Senior	14.40	415.00	5,976.00
He,Ileana	Billable	Senior	18.80	415.00	7,802.00
Houareau,Tina	Billable	Senior	7.20	415.00	2,988.00
Huang,Fei Yu	Billable	Senior	6.00	415.00	2,490.00
Huang,Ricki	Billable	Senior	2.90	415.00	1,203.50
Huang,Vanesa	Billable	Senior	8.30	415.00	3,444.50
Katikireddi,Teja Sreenivas	Billable	Senior	44.50	415.00	18,467.50
MacLean,Corrie	Billable	Senior	81.80	415.00	33,947.00
Perez,Ellen Joy	Billable	Senior	11.50	415.00	4,772.50
Sangster,Mark	Billable	Senior	7.90	415.00	3,278.50
Sun,Yuchen	Billable	Senior	0.90	415.00	373.50
Zhu,Philip	Billable	Senior	1.30	415.00	539.50
Goyal,Rahul	Billable	Senior	1.00	415.00	415.00
Inker,Brian	Billable	Senior	7.50	415.00	3,112.50
Prabhu,Nilesh	Billable	Senior	1.00	415.00	415.00
Agarwal,Akhil	Billable	Senior	3.10	415.00	1,286.50
Dugasse,Tara	Billable	Senior	5.80	415.00	2,407.00
Hardie,Cam	Billable	Senior	3.90	415.00	1,618.50
Mallwitz,Katharina	Billable	Senior	12.50	415.00	5,187.50
O'Reilly,Logan	Billable	Senior	23.00	415.00	9,545.00
Liu,Ke	Billable	Senior	14.00	415.00	5,810.00
Michael,Yiannis	Billable	Senior	0.60	415.00	249.00
Sakaguchi,Masato	Billable	Senior	199.20	415.00	82,668.00
Yeom,Sunny	Billable	Senior	113.00	415.00	46,895.00
Lammey,Caitlin	Billable	Senior	10.30	415.00	4,274.50
Yang,Ming	Billable	Senior	13.00	415.00	5,395.00
Allen,Jenefier Michelle	Billable	Staff	0.60	236.00	141.60
Braun,Avi	Billable	Staff	44.10	236.00	10,407.60
Choudary,Hira	Billable	Staff	33.40	236.00	7,882.40
Gabison,Salome	Billable	Staff	0.50	236.00	118.00
Geisler,Arthur	Billable	Staff	50.00	236.00	11,800.00
Karan,Anna Suncheuri	Billable	Staff	28.80	236.00	6,796.80
Neziroski,David	Billable	Associate	57.50	365.00	20,987.50
Nguyen,Thinh	Billable	Staff	21.00	236.00	4,956.00
Noda,Sachiho	Billable	Staff	0.70	236.00	165.20
Ortiz,Daniella	Billable	Staff	30.60	236.00	7,221.60

Name	Type	Rank	Hours	Hourly Rate	Total Individual Fees
Vasic,Dajana	Billable	Staff	7.10	236.00	1,675.60
Zhuo,Melody	Billable	Staff	168.50	236.00	39,766.00
Bruno,Hannah	Billable	Staff	4.30	236.00	1,014.80
Charalambous,Chrysanthos	Billable	Staff	1.50	236.00	354.00
Feliciano,Christopher	Billable	Staff	12.40	236.00	2,926.40
Frapolly,Brody	Billable	Staff	26.80	236.00	6,324.80
Li,Eric	Billable	Staff	2.00	236.00	472.00
Louie,Alexis P	Billable	Staff	3.30	236.00	778.80
Sarte,Angel Lyne	Billable	Staff	1.50	236.00	354.00
Angeli,Ioannis	Billable	Staff	1.90	236.00	448.40
Ijuin,Ayane	Billable	Staff	26.10	236.00	6,159.60
Schmid,Oliver	Billable	Staff	2.20	236.00	519.20
Mok,Wan Ling	Billable	Staff	29.60	236.00	6,985.60
Ramkalawan,Rachel	Billable	Staff	5.80	236.00	1,368.80
Ashihara,Kae	Billable	Staff	48.80	236.00	11,516.80
Chopra,Navya	Billable	Staff	3.00	236.00	708.00
Mensah,Josephine	Billable	Staff	68.50	236.00	16,166.00
Scott,James	Billable	Client Serving Contractor JS	41.70	600.00	25,020.00
Scott,James	Travel ¹	Client Serving Contractor JS	1.40	300.00	420.00
Bieganski,Walter	Billable	Client Serving Contractor WB	7.20	200.00	1,440.00
Totals			3,071.70		\$1,542,852.80

¹ Travel fees are billed out at 50% bill rate

Blended Hourly Rate: \$502.28

STATEMENT OF FEES BY PROJECT CATEGORY
MAY 1, 2024 THROUGH AND INCLUDING MAY 31, 2024

Project Category	Project Category Description	Hours	Fees
ACR Bookkeeping/ACR Statutory Reporting	This category includes time spent compile information provided by client, the annual balance sheet, and related statements of income, retained earnings, and cash flows in accordance with the International Standard on Related Services (ISRS) 4410 (Revised), Compilation Engagements, or local regulatory requirements, as appropriate. This is to assist client in presenting financial information in the form of financial statements	549.40	\$ 240,381.10
Fee/Employment Applications	This category relates to the preparation of EY's employment application and planning and coordinating the professionals' time protocols, preparation of monthly fee statements, preparation of interim fee applications, invoices, and responding to inquiries	80.30	30,252.60
Information Reporting	Reporting of income paid to certain US-based investors, vendors, and independent contractors	49.10	35,340.40
IRS Audit Matters	Responding to the inquiries of the IRS related to current/prior tax years.	29.70	20,742.60
Non US Tax	Taxation of all non-US based or related activities and taxpayers	468.80	264,853.30
Non-Working Travel (billed at 50% of rates)	This category includes all travel time not otherwise chargeable to the Debtors. This time is charged at a 50% rate.	27.00	10,764.10
Payroll Tax	Taxation of Global and US-based payroll and employment tax requirements	107.80	85,860.00
Project Management Office Transition	Preparation for, attendance at and participation in periodic meetings, discussions and analyses regarding coordination of EY services and international teams in order to align on information, assumptions, and issues.	146.40	63,712.40
Tax Advisory	The projects covered by on-call tax advisory services include assistance with tax issues by answering one-off questions, drafting memos describing how specific tax rules work, assisting with general transactional issues, and assisting Client in connection with International Tax Services dealings with tax authorities (other than representing Client in an examination or an appeal before the IRS or other taxing authority).	22.30	17,358.90
Technology	Ingestion, transformation, and analysis of FTX data to be leveraged by the tax workstreams in order to facilitate the preparation and completion of deliverables.	316.80	158,890.80
Transfer Pricing	Determine arm's length pricing in related-party transactions	291.30	142,113.50
US Income Tax	Taxation of all US-based or related activities and taxpayers	267.60	157,374.80

Project Category	Project Category Description	Hours	Fees
US International Tax	Taxation of all non-US based or related activities as it impacts on US based taxpayers	607.50	264,562.60
US State and Local Tax	Taxation of all US-based or related activities and taxpayers as assessed by each state and local jurisdiction	87.80	40,904.80
Value Added Tax	Taxation of non-US based indirect based or related activities and taxpayers	19.90	9,740.90
Total		3,071.70	\$1,542,852.80

SUMMARY OF ACTUAL AND NECESSARY EXPENSES

Expense Category		Expense Amount
Airfare		\$ 3,577.31
Ground Transportation		1,796.34
IT Data		73,229.00
Lodging		9,358.66
Meals		439.75
VAT		555.01
Total		\$ 88,956.07

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**EIGHTEENTH MONTHLY FEE STATEMENT OF ERNST & YOUNG LLP AS
TAX SERVICES PROVIDER TO THE DEBTORS AND DEBTORS-IN-POSSESSION
FOR COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD
FROM MAY 1, 2024 THROUGH AND MAY 31, 2024**

Ernst & Young LLP (“EY LLP”), Tax Services Provider to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession in the above-captioned cases (collectively, the “Debtors”), hereby submits this eighteenth monthly fee statement (this “Monthly Fee Statement”) for compensation for professional services rendered and expenses incurred for the period from May 1, 2024 through and including May 31, 2024 (the “Fee Period”). In support of the Monthly Fee Statement, EY LLP respectfully states as follows:

Background

1. On November 11 and November 14, 2022,² the Debtors filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) voluntary petitions for relief under title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (as amended or modified, the “Bankruptcy Code”). The Debtors continue to operate their businesses and manage their

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

² November 11, 2022 is the petition date for all Debtors, except for Debtor West Realm Shires Inc.

properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. Joint administration of the Debtors' cases (the "Chapter 11 Cases") was authorized by the Court by entry of an order on November 22, 2022 [D.I. 128]. On December 15, 2022, the Office of the United States Trustee for the District of Delaware (the "U.S. Trustee") appointed an Official Committee of Unsecured Creditors (the "Committee") pursuant to section 1102 of the Bankruptcy Code [D.I. 231].

2. On January 17, 2023, the Court entered the Order Authorizing the Retention and Employment of EY LLP as Tax Services Provider *Nunc Pro Tunc* to November 28, 2022 [D.I. 505] authorizing the retention and employment of EY LLP as the Debtors' Tax Services Provider, *nunc pro tunc* to November 28, 2022.

3. On January 9, 2023, the Court entered the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [D.I. 435] (the "Interim Compensation Order").

4. On March 8, 2023, the Court entered the Order (I) Appointing Fee Examiner and (II) Establishing Procedures for Consideration of Requested Fee Compensation and Reimbursement of Expenses [D.I. 834] appointing Katherine Stadler (the "Fee Examiner") to serve as the fee examiner in these Chapter 11 Cases and establishing certain procedures in connection therewith.

Relief Requested

5. By this Monthly Fee Statement and in accordance with the Interim Compensation Order, EY LLP makes this application for (i) allowance of compensation as an administrative expense of the Debtors' estates in the amount of \$1,542,852.80 for reasonable and necessary professional services rendered, (ii) payment of compensation in the amount of 80% thereof (in the amount of \$1,234,282.24) and (iii) payment of \$88,956.07 for actual and necessary expenses incurred.

a. Compensation Requested

6. The services performed by EY LLP during the Fee Period included tax services. Attached hereto as Exhibit A is a detailed itemization, by project category, of all services performed by EY LLP with respect to the Chapter 11 Cases during the Fee Period. This detailed itemization complies with Local Rule 2016-2 in that each time entry contains a separate time allotment, a description of the type of activity and the subject matter of the activity, all time is billed in increments of one-tenth (1/10) of an hour, time entries are presented chronologically in categories, and all meetings or hearings are individually identified.

7. The timekeepers who rendered services related to each category are identified in Exhibit A, along with the number of hours for each individual and the total compensation sought by each category. All services for which EY LLP requests compensation were performed for, or on behalf of, the Debtors.

b. Expense Reimbursement

8. EY LLP incurred out-of-pocket expenses during the Fee Period in the amount of \$88,956.07. Attached hereto as Exhibit B is a description of the expenses actually incurred by EY LLP in the performance of services rendered as Tax Services Provider to the Debtors. The expenses are broken down into categories of charges, which may include, among other things, the following charges: airfare, lodging, ground transportation, working meals, and other expenses. Value Added Tax (“VAT”) is a consumption tax in which certain foreign firms are required by local tax authority regulations to charge for services performed during this engagement.

9. In accordance with section 330 of the Bankruptcy Code, EY LLP seeks reimbursement only for the actual cost of such expenses to EY LLP. EY LLP submits that all such expenses incurred were customary, necessary and related to the Chapter 11 Cases and, by

this Monthly Fee Statement, requests reimbursement of the same.

Valuation of Services

10. Professionals of EY LLP have expended a total of 3,071.70 hours in connection with this matter during the Fee Period.

11. The amount of time spent by each of the professionals' providing services to the Debtors for the Fee Period is set forth in Exhibit A. The rates are EY LLP's normal hourly rates of compensation for work of this character. The reasonable value of the services rendered by EY LLP for the Fee Period as Tax Services Provider for the Debtors in the Chapter 11 Cases is \$1,542,852.80.

12. EY LLP believes that the time entries included in Exhibit A attached hereto and the expense breakdown set forth in Exhibit B attached hereto are in compliance with the requirements of Local Rule 2016-2.

13. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amount requested is fair and reasonable given the complexities of these Chapter 11 Cases, the time expended, the nature and extent of the services rendered, the value of such services, and the costs of comparable services other than in a case under this title.

Certificate of Compliance and Waiver

14. The undersigned representative of EY LLP certifies that he has reviewed the requirements of Local Rules 2016-2 and that the Monthly Fee Statement substantially complies with such rule. To the extent that the Monthly Fee Statement does not comply in all respects with the requirements of Local Rule 2016-2, EY LLP believes that such deviations are not material and respectfully requests that any such requirements be waived.

Notice and No Prior Request

15. Notice of this Monthly Fee Statement has been given to the following parties or, in lieu of, to their counsel, if known: (a) the U.S. Trustee; (b) the Official Committee of Unsecured Creditors and (d) all parties required to be given notice in the Interim Compensation Order. EY LLP submits that no other or further notice is necessary.

16. No prior request for the relief sought in this Monthly Fee Statement has been made to this or any other Court.

WHEREFORE, EY LLP respectfully requests that the Bankruptcy Court (i) approve the Monthly Fee Statement and (ii) grant such further relief as is just and proper.

/s/ Thomas M. Shea
Thomas M. Shea
Partner/Principal
Ernst & Young LLP